

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647
WWW.SWIDLAW.COM

Jeanne W. Stockman
Direct Dial: (202) 295-8392
Fax: (202) 424-7643
JWStockman@swidlaw.com

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
TEL. (212) 973-0111
FAX (212) 891-9598

June 19, 2002

VIA ELECTRONIC SUBMISSION

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
TW-A325
Washington, DC 20554

**Re: Update to Report and Request for Waiver of PrimeCo
Spectrum Holdings LLC on Plans for Implementation of
Wireless Enhanced 911 Phase II Automatic Location
Identification (ALI) System for Station WPQL237
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of PrimeCo Spectrum Holdings LLC ("PrimeCo Spectrum"), we hereby submit an update to its "Report and Request for Waiver of PrimeCo Spectrum Holdings LLC on Plans for Implementation of Wireless Enhanced 911 Phase II Automatic Location Identification (ALI) System for Station WPQL237" filed on November 29, 2002 in CC Docket No. 94-102.

Implementation Schedule for Network Upgrades

At the time of its November 29, 2001 Report and Waiver Request, PrimeCo Spectrum was in discussions with technology suppliers to provide, on a service bureau basis, E911 Phase II ALI services. PrimeCo has been diligent in ongoing discussions with a chosen technology supplier; however, the supplier has been unable to identify a definitive deployment schedule. As a result, the timetable for network upgrades discussed in PrimeCo Spectrum's November 29, 2001 report and waiver request has experienced a delay. PrimeCo Spectrum will provide a progress update on or before August 1, 2002 with more specific network deployment details. In addition, PrimeCo

Wireless Communications LLC (“PrimeCo Wireless”), the parent company of Chicago 20MHz, LLC (“Chicago 20MHz”), which in turn, is the parent of PrimeCo Spectrum, has entered into an agreement to sell its interest in Chicago 20MHz to United States Cellular Corporation (“US Cellular”). PrimeCo Spectrum expects to file an additional update to the FCC after completion of the above mentioned purchase agreement.

Implementation Schedule for Handsets

PrimeCo Spectrum has begun selling ALI-capable handsets and anticipates that it will be able to continue to comply with the handset implementation schedule proposed in its November 29, 2001 Report and Waiver Request.

PSAP Requests

The following PSAPs within PrimeCo Spectrum’s service coverage area have requested Phase II E911 service:

State	County	PSAP	Phase II request date
Illinois	Cook	City of Chicago	7/31/00
Illinois	Cook	Morton Grove	1/09/01
Illinois	Cook	Winthrop Harbor	3/14/01
Indiana	Lake	Lake Sheriff	4/13/01
Illinois	Cook	Glenview	4/15/01
Illinois	Cook	Wheeling	4/17/01
Illinois	Cook	Barrington Hills	5/11/01
Illinois	Cook	Rosemont	10/30/01
Illinois	Lake	Waukegan	11/14/01
Illinois	Cook	Deerfield	11/24/01
Illinois	Cook	Skokie	1/2/02
Illinois	Cook	Evanston	1/31/02
Illinois	Cook	Northbrook	2/1/02
Illinois	Cook	Orland Park	2/14/02
Illinois	Cook	Cook County	2/25/02
Illinois	Cook	Northfield	5/31/02

PrimeCo Spectrum has received 187 requests from PSAPs to provide E911 Phase I service. It has implemented E911 Phase I service to 170 PSAPs and has worked out implementation timetables with each of the remaining requesting PSAPs. PrimeCo Spectrum anticipates that by August 1, 2002, it will be providing E911 Phase I service to every PSAP that is ready and has had a valid request for E911 Phase I service that will have been pending for six months or more. Because PrimeCo Spectrum has worked out deployment schedules with each of the PSAPs, no waiver is necessary for E911 Phase I.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Jeanne W. Stockman